

Federal Defenders OF NEW YORK, INC.

Southern District
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Southern District of New York
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January 9, 2020

VIA ECF

The Honorable Richard M. Berman
United States District Judge
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

USDC SDNY
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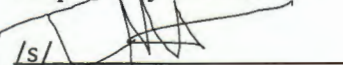
RE: **United States v. Mitchell McPhee**
19 Cr. 745 (RMB)

Dear Judge Berman:

I write - with no objection from Pretrial Services and the consent of the Government to respectfully request that the Court temporarily modify Mr. McPhee's bail conditions to permit him to travel to Hamden, Connecticut on Saturday, January 11, 2020, and return to New York City the same day. On September 25, 2019, Magistrate Judge Robert W. Lehrburger set the following bail conditions, *inter alia*: A \$50,000 personal recognizance bond secured by two financially responsible persons; travel limited to SDNY/EDNY; surrender of travel documents and no new applications; pretrial supervision as directed; curfew with electronic monitoring; and defendant to continue or seek employment.

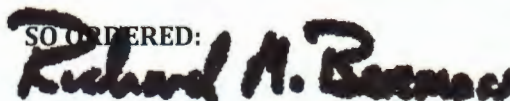
Mr. McPhee's uncle, who is one of the co-signers on his bond, is in the process of moving to Hamden, Connecticut, and he would like to pay Mitchell to help him move this Saturday. With the Court's permission, Mr. McPhee would depart from New York at 9AM on Saturday, January 11th, and return from Connecticut by 9PM the same day. The Government and Pretrial Services Officer Ashley Cosme do not object to Mr. McPhee's request. Thank you for your consideration of this matter.

Respectfully submitted,


/s/

Ian Marcus Amelkin
Assistant Federal Defender
(212) 417-8733

SO ORDERED:



HONORABLE RICHARD M. BERMAN
UNITED STATES DISTRICT JUDGE

1/9/2020